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11 *TS-Optics Corporation*

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

15 TS-OPTICS CORPORATION,

16 Plaintiff,

17 v.

18 MICROSOFT CORPORATION,

19 Defendant.

20 Case No. 8:24-cv-01974-DOC-DFM

21 **PLAINTIFF'S UNOPPOSED**
MOTION FOR ISSUANCE OF
LETTER OF REQUEST FOR
INTERNATIONAL JUDICIAL
ASSISTANCE

22 Hearing Date: Sept. 8, 2025
23 Time: 8:30 a.m.
24 Courtroom: 10a

1 Plaintiff TS-Optics Corporation (“Plaintiff”) respectfully requests that the
2 Court issue the letter of request attached hereto as Exhibit 1 (“Letter of Request”).
3 The Letter of Request solicits assistance from the authorities of Japan (“Japan”) to
4 obtain documents and deposition testimony from Hitachi-LG Data Storage, Inc
5 (“HLDS”).

6 **I. FACTUAL BACKGROUND**

7 Plaintiff is the owner by assignment of the patents-in-suit, including U.S.
8 Patent No. 7,266,055 (the “’055 patent”). The ’055 patent is directed at an optical
9 pickup actuator that Microsoft is accused of, *inter alia*, using and selling. *E.g.*, Dkt.
10 1-2. According to Microsoft, certain aspects of the accused actuators are provided
11 by HLDS.

12 Plaintiff respectfully requests that the Court issue the attached Letter of
13 Request to the judicial authorities of Japan to allow it to seek relevant discovery
14 about the Accused Products. *See* Exhibit 1.¹

15 **II. ARGUMENT**

16 The Hague Convention “procedures are available whenever they will facilitate
17 the gathering of evidence by the means authorized in the Convention.” *Société*
18 *Nationale Industrielle Aéropostiale v. U.S. Dist. Ct. for the S. Dist. of Iowa*, 482 U.S.
19 522, 541 (1987). Because Japan is a party to the Hague Convention, the attached
20 Letter of Request is an appropriate means for seeking discovery from HLDS.²

21 As reflected in the attached Letter of Request, Plaintiff seeks, among other
22 things, documents and testimony related to HLDS’ role in developing and selling
23 the Accused Products. *See* Exhibit 1. This information is directly related to the issues
24

25 ¹ Should the Court grant Plaintiff’s Motion for Issuance of Letter of Request, Plaintiff will obtain
26 a certified Japanese translation of Exhibit 1.

27 ² See <https://travel.state.gov/content/travel/en/legal/Judicial-Assistance-Country-Information/Japan.html> (last accessed July 29, 2025); *see also* 28 USC § 1781(b)(2) (permitting
28 the “transmittal of a letter rogatory or request directly from a tribunal in the United States to the
foreign or international tribunal, officer, or agency to whom it is addressed and its return in the
same manner”)

1 in this case, including but not limited to, infringement. Accordingly, Plaintiff
2 requests that the Court issue the attached Letter of Request to the judicial authorities
3 of Japan to obtain documents and testimony from HLDS that may be vital to Plaintiff
4 in this case.

5 Plaintiff has met and conferred with Microsoft, and counsel for Microsoft has
6 confirmed it does not oppose the relief sought in this motion. Microsoft also agreed
7 to waive the requirement in Local Rule 7-3 regarding waiting 7 days to file the
8 motion.

9 | III. CONCLUSION

10 Plaintiff respectfully requests that the Court issue the attached Letter of
11 Request to the judicial authorities of Japan to obtain relevant documents and other
12 information from HLDS.

DATED: July 30, 2025

/s/ Benjamin T. Wang

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TS-Optics Corporation*

CERTIFICATION OF L.R. 7-3 CONFERENCE OF COUNSEL

I hereby certify that on July 25, 2025, counsel for Plaintiff and Defendant held a telephonic meet and confer to discuss the issues addressed above. Defendant informed Plaintiff on July 28, 2025 that it did not oppose the relief requested. Defendant also agreed to waive the requirement that Plaintiff wait 7 days before filing the motion.

/s/ Benjamin T. Wang
Benjamin T. Wang

CERITIFICATE OF WORD COUNT

The undersigned hereby certifies that the foregoing document contains 5,209 words, which complies with the word limit of L.R. 11-6.1.

/s/ Benjamin T. Wang
Benjamin T. Wang

CERTIFICATE OF SERVICE

I hereby certify that on July 30, 2025, I electronically filed the foregoing document with the Clerk of the Court for the Central District of California using the ECF System which will send notification to the registered participants of the ECF System as listed on the Court's Notice of Electronic Filing.

/s/ Benjamin T. Wang
Benjamin T. Wang